

REMARKS

In response to the above-identified Office Action, Applicants amend the application and seek reconsideration thereof. In this response, Applicants amend Claim 8. Applicants do not cancel or add any new claims. Accordingly, Claims 1-9 are pending.

The Examiner objects Claim 8 since this claim seemed to depend from claim 6 (apparatus) and recited it depended from claim 1 (method). As indicated herein, Applicants amend claim 8 to correct the error. Accordingly, Applicants respectfully request approval of claim 8 as amended.

1. Claims Rejected Under 35 U.S.C. §102(a)

The Examiner rejects Claims 1 and 3-5 under 35 U.S.C. 102(a) as being anticipated by U.S. Patent No. 5,838,924 to Anderson, et al. ("Anderson"). Applicants amend independent Claim 1 to overcome the rejection.

In order to anticipate a claim, the relied upon reference must disclose every limitation of the claim. Among other limitations, independent Claim 1 recites a method comprising mapping a first physical identifier for a first physical signal line to the logical identifier, and remapping a second physical identifier for a second physical signal line to the logical identifier responsive to a line failure on the first physical signal line.

In making the rejection, the Examiner relies on Anderson to show a method including fixing a logical identifier for a signal line at an egress interface; mapping a first physical identifier for a first physical signal line to the logical identifier; and remapping a second physical identifier for a second physical signal line to the logical identifier responsive to a line failure on the first physical signal line. However, Anderson, at a minimum, fails to teach or suggest at least remapping a second physical identifier for a second physical signal line to the logical identifier responsive to a line failure on the first physical signal line as Applicants have claimed.

Anderson teaches that when a failure in working signal line is detected, the system switches signals to a protection signal line. In Anderson, once a signal is switched to a protection signal line, the signal remains on the protection signal line until the signal reaches its destination. This requires that the system store the routes of any switched signals to a memory table and, upon arrival of a

signal at its destination, check the memory table so that the switched signals can be directed to their desired destination.

In contrast, in Applicants' claimed method, when a failure is detected on a working signal line, the system switches signals to protection lines. The signals do not necessarily remain on the protection line until the signals reach their destination. Rather, after a signal is switched to a protection line, the system routes the signal back to its intended working line path at a location past the site of the working line's failure. Therefore, the signal arrives at its destination on the working line it was originally intended to arrive on and does not require the system to "remember" that the signal was switched to a protection line. Thus, Anderson fails to teach or suggest at least this limitation of Claim 1.

Accordingly, Applicants respectfully request withdrawal of the rejection of independent Claim 1. Claims 3-5 depend from Claim 1 and are not anticipated at least for the same reasons as Claim 1. Accordingly, Applicants respectfully request withdrawal of the rejection of Claims 3-5.

II. Claims Rejected Under 35 U.S.C. §103(a)

The Examiner rejects Claim 2 under 35 U.S.C. 103(a) as being obvious over Anderson in view of U.S. Patent No. 6,353,593 B1 to Chen, et al. ("Chen"). Applicants traverse the rejection.

In order to render a claim obvious, the relied upon references must teach or suggest every limitation of the claim such that the invention as a whole would have been obvious at the time the invention was made to one skilled in the art.

In making the rejection, the Examiner relies on Anderson to teach all of the limitations of Claim 2 except mapping being comprised of rewriting a cross connect table. The Examiner relies on Chen's disclosure of an ATM switch fabric 68 which includes an ATM cross-connect 72 to cure this alleged defect.

Applicants note that Claim 2 depends from Claim 1 and contains all of the limitations thereof. Therefore, the discussion above with respect to Claim 1 is applicable and incorporated by reference. In addition, Applicants have reviewed Chen and have been unable to discern any part of Chen that teaches or suggests that the device taught therein includes remapping a second physical

identifier for a second physical signal line to the logical identifier responsive to a line failure on the first physical signal line. Thus, Chen fails to correct the defects of Anderson. Accordingly, Applicants respectfully request withdrawal of the rejection of Claim 2.

The Examiner rejects Claims 6-9 under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,317,426 to Afanador et al. ("Afanador") in view of Chen. Applicants traverse the rejection.

In making the rejection, the Examiner relies on Afanador's disclosure to show a bus interface, an ingress time slot interchange module, a switch fabric coupled to the ingress time slot interchange module and an egress time slot interchange (ETSI) module having a plurality of inputs. The Examiner states that Afanador does not disclose each input assigned a logical identifier which remains fixed after initialization. For this limitation, the Examiner relies on Chen's disclosure to show each input of an ETSI is assigned a logical identifier which remain fixed after initialization. Chen, col. 5, lines 43-56.

Chen teaches a cross-connect relating to switching ATM cells from an input port to an output port. Chen, col. 5, lines 43-45. Chen also discloses a bridging function 74 being implemented by a cross connection for transmitting virtual channel connections (VPC), virtual path connections, and/or virtual path groups onto both a working and transmission link where each VPC tunnel is treated as a logical subport and handled by a scheduler on an ATM switch fabric. Chen, col. 5, lines 48-56.

In reviewing the section cited by the Examiner, Applicants cannot discern any part that teaches or suggests the assignment of logical identifiers independent of the physical lines on which received. This section also fails to address the fixing of the identifier on the egress input as claimed.

In addition, Applicants have reviewed Chen in its entirety and cannot discern any teaching or suggestion of each input of an ETSI module being assigned a logical identifier which remains fixed after initialization. Therefore, Chen fails to cure the defects of Afanador. Accordingly, Applicants respectfully request withdrawal of the rejection of independent Claim 6.

It is further respectfully submitted that the asserted combination could be obtained only through inappropriate hindsight guided by Applicants' own disclosure. Neither reference provides a motivation to grab the cross connect element from Chen a la carte for insertion in Afanador. Moreover, it is unclear from the references how such a combination would be accomplished.

Claim 7-9 depend from Claim 6 and are allowable at least for the same reasons as Claim 6. Accordingly, Applicants respectfully request withdrawal of the rejection of Claims 7-9.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending (1) are in proper form, (2) are neither obvious nor anticipated by the relied upon art of record, and (3) are in condition for allowance. A Notice of Allowance is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207-3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

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CERTIFICATE OF MAILING:

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on August 25, 2003.

Nadya Gordon 8/25/03

Nadya Gordon Date